

**REMARKS**

In the Office Action, dated September 21, 2007, the Examiner rejects claim 6 under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph, for allegedly failing to particularly point out and distinctly claim the subject matter which the applicant regards as his invention; and rejects claims 1-18 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,999,929 A to Goodman (hereinafter "GOODMAN"). Applicants respectfully traverse these rejections.<sup>1</sup>

By way of the present amendment, Applicants cancel claims 8 and 13 without prejudice or disclaimer, amend claim 7 to incorporate the features of claim 8 and to improve form, amend claim 12 to incorporate the features of claim 13 and to improve form, and amend claims 3, 6, 9, and 14 to improve form. No new matter is being added. Claims 1-7, 9-12, and 14-18 are pending.

Claim 6 stand rejected under 35 U.S.C. § 112, 2<sup>nd</sup> paragraph, for allegedly failing to particularly point out and distinctly claim the subject matter which the applicant regards as his invention. Applicants respectfully traverse this rejection.

The Examiner alleged that claim 6 recited the limitation "reduced number of parameters," for which there is insufficient antecedent basis (Office Action, p. 2). Applicants have amended claim 6 to address the Examiner's concern.

For at least the foregoing reasons, Applicants submit that claim 6 meets the requirements of 35 U.S.C. § 112, 2<sup>nd</sup> paragraph.

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<sup>1</sup> As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

Pending claims 1-7, 9-12, and 14-18 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by GOODMAN. Applicants respectfully traverse this rejection.

A proper rejection under 35 U.S.C. § 102 requires that a reference teach every aspect of the claimed invention. Any feature not directly taught must be inherently present. See M.P.E.P. § 2131. GOODMAN does not disclose the combination of features recited in Applicant's claims 1-7, 9-12, and 14-18.

Independent claim 1 is directed to a method that includes receiving a first uniform resource locator (URL) including one or more parameters, retrieving content corresponding to the first URL, retrieving content corresponding to a plurality of URLs having different parameter combinations of the one or more parameters, identifying a parameter combination from the plurality of URLs that corresponds to content that is approximately the same as the content corresponding to the first URL, and generating one or more URL rewrite rules based on the identified parameter combination. GOODMAN does not disclose or suggest this combination of features.

For example, GOODMAN does not disclose or suggest retrieving content corresponding to a plurality of URLs having different parameter combinations of one or more parameters, as recited in claim 1. The Examiner relies on col. 4, lines 41-50 of GOODMAN for allegedly disclosing this feature (Office Action, p. 3). Applicants respectfully disagree with the Examiner's interpretation of GOODMAN.

Col. 4, lines 41-50 of GOODMAN disclose:

After the front end 12 receives the Web page (as represented in FIG. 1 by the legend "Web Pages From WWW Responsive To Browser Request"), it (that is, the front end 12) will scan through the Web page to locate links in the page. As is conventional, a link in a Web page is contained within an HTML tag, for example, within an "anchor" tag, referred to as "<A HREF=HTTP://[xxxx]>"

where "HTTP://[xxxx]" is the URL for a Web page and "[xxxx]" is a World Wide Web address, all in ASCII form. For each URL identified by the front end 12 in the Web page, the front end 12 will pass the URL to the back end 13. The back end 13, in turn, will indicate whether the respective URL is associated with a class and, if so, the particular class. More particularly, the back end 13 will return to the front end 12 a URL identifying a Web page, in particular the URL for a Web page maintained by the back end 13 that contains the list of links that are in the class which also contains the URL that the front end 12 provided to the back end 13.

This section of GOODMAN discloses scanning a web page for URL links, and for each URL identified on the webpage, passing the URL to the back end, where it is determined whether that particular URL is associated with a class. The back end then returns to the front end a list of links in the class that contains that URL. This section of GOODMAN does not disclose anything about parameter combinations. In fact, this section of GOODMAN does not disclose or suggest anything that could reasonably be interpreted as corresponding to one or more parameters, as recited in claim 1. Therefore, this section of GOODMAN cannot disclose or suggest retrieving content corresponding to a plurality of URLs having different parameter combinations of one or more parameters, as recited in claim 1. If this rejection is maintained, Applicants respectfully request that the Examiner explain how the above section of GOODMAN (or any other section of GOODMAN) can reasonably be construed as disclosing the above feature of claim 1.

Moreover, GOODMAN does not disclose or suggest identifying a parameter combination from a plurality of URLs that corresponds to content that is approximately the same as the content corresponding to a first URL, as also recited in claim 1. The Examiner relies on col. 4, lines 41-50 of GOODMAN for allegedly disclosing this feature (Office Action, p. 3). Col. 4, lines 41-50 of GOODMAN were reproduced above. As stated above, this section of GOODMAN discloses scanning a web page for URL links, and for each URL identified on the webpage, passing the URL to the back end, where it

is determined whether that particular URL is associated with a class. The back end then returns to the front end a list of links in the class that contains that URL. This section of GOODMAN does not disclose or suggest determining whether the content to which a plurality of URLs corresponds is approximately the same as the content to which a first URL corresponds. Furthermore, as stated above, this section of GOODMAN does not disclose or suggest anything that can be reasonably construed as corresponding to a parameter combination as recited in claim 1. Therefore, this section of GOODMAN cannot disclose or suggest identifying a parameter combination from a plurality of URLs that corresponds to content that is approximately the same as the content corresponding to a first URL, as recited in claim 1.

For at least the foregoing reasons, Applicants submit that claim 1 is not anticipated by GOODMAN.

Claims 2-6 depend from claim 1. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 1.

Independent claim 7 is directed to a method for converting a uniform resource locator (URL) into a canonical form of the URL. The method includes receiving a URL that refers to content and that contains a parameter set including at least one parameter, determining a rewrite rule by receiving a plurality of URLs that contain the parameter set and identifying parameters in the parameter set that do not contribute to content, applying the rewrite rule to the URL by removing the parameters that do not contribute to content from the URL, and outputting the rewritten URL as the canonical form of the URL. GOODMAN does not disclose or suggest this combination of features.

For example, GOODMAN does not disclose or suggest determining a rewrite rule

by receiving a plurality of URLs that contain the parameter set and identifying parameters in the parameter set that do not contribute to content, as recited in claim 7. The Examiner relies on col. 5, lines 17-21 of GOODMAN for allegedly disclosing this feature (Office Action, p. 6). Applicants respectfully disagree with the Examiner's interpretation of GOODMAN.

Col. 5, lines 17-21 of GOODMAN disclose:

To assist in the duplicate Web page consolidation operation, the Web page analyzer 15 develops the URL re-write rulebase 16B, which contains rules which are used by the Web page analyzer 15 to convert URLs to respective canonical forms.

This section of GOODMAN discloses that the Web page analyzer converts URLs into canonical forms. This section of GOODMAN does not disclose or suggest anything about parameters, or about whether any particular section of a URL affects the content. Therefore, this section of GOODMAN cannot disclose or suggest determining a rewrite rule by receiving a plurality of URLs that contain the parameter set and identifying parameters in the parameter set that do not contribute to content, as recited in claim 7. If this rejection is maintained, Applicants respectfully request that the Examiner explain how the above section of GOODMAN (or any other section of GOODMAN) can reasonably be construed as disclosing the above feature of claim 7.

For at least the foregoing reasons, Applicants submit that claim 7 is not anticipated by GOODMAN.

Claims 9-11 depend from claim 7. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 7.

Independent claim 12 recites features similar to, yet possibly of different scope than, the features recited above with respect to claim 7. Therefore, this claim is not

anticipated by GOODMAN for at least reasons similar to the reasons set forth above with respect to claim 7.

Claims 14-16 depend from claim 12. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 12.

Independent claim 17 and 18 recite features similar to, yet possibly of different scope than, the features recited above with respect to claim 1. Therefore, these claims are not anticipated by GOODMAN for at least reasons similar to the reasons set forth above with respect to claim 1.

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

While the present application is believed to be in condition for allowance, should the Examiner find some issue to remain unresolved, or should any new issues arise that could be eliminated through discussions with Applicants' representative, then the Examiner is invited to contact the undersigned by telephone to expedite prosecution of the present application.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

HARRITY SNYDER, L.L.P.

By: /Viktor Simkovic, Reg. No. 56,012/  
Viktor Simkovic  
Registration No. 56,012

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Harrity Snyder, L.L.P.  
11350 Random Hills Road  
Suite 600  
Fairfax, Virginia 22030  
Main: (571) 432-0800  
Direct: (571) 432-0899  
Customer Number: **44989**